

Ethical Audit Desktop Analysis  
Matrix of Key Information held by Swindon Borough Council  
October 2012

	Key Information	Held	Current position, including action taken since the last review in October 2011.	Area of Review or Action to be identified by the Standards Committee.
1	Constitutions/ Current Decision Making Framework (ie the committees and sub-committees)	Yes	<p>The Constitution is reviewed and updated at least annually and was adopted in full in May 2012, and amended in June 2012 to take into account changes under the Localism Act 2011 to the standards regime and the adoption of a new Members Code of Conduct.</p> <p>Amendments were also made in January 2012 to take account of the new rules in relation to pre-determination of decisions under the Localism Act 2011. Updates were also made to the Constitution, in particular the Officer Delegations as a request of new Officer Structures (under Stronger Together) adopted from 1 April 2012.</p> <p>The Constitution's operation is monitored by the Monitoring Officer and also by the Corporate Governance Working Party whose recommendations feed into the review process.</p> <p>The Council's Audit Committee was first established in May 2006 and continues to operate effectively. It receives assurances from the Standards Committee in relation to matters of internal control such as the operation of the Whistleblowing Policy.</p> <p>The Annual Audit letter for 2008/09 confirmed that the 'Governance arrangements' of the Council were sound with 'examples of notable practice identified'.</p> <p>The Council is increasingly working with external</p>	

			partners and stakeholders. Many of the Council's partnership relationships are now managed through the One Swindon Board, with appropriate governance arrangements in place.	
2	Procedural Standing Orders	Yes	Updated in Constitution – May 2012	
3	Contracts Standing Orders	Yes	Updated in Constitution – May 2012	
4	Employees' Code Of Conduct	Yes	<p>Following consultation with Council employees and unions, the Employee Code of Conduct was approved by the Standards Committee in July 2006. The Code of Conduct was been issued to all Council employees, who were required to sign to confirm that they have read and will act in accordance with the Code.</p> <p>A statutory Code was consulted on in October 2008 by the Department of Communities and Local Government, but no further action has been taken on this matter.</p>	
5	Members' Code Of Conduct plus Local Guidance	Yes	<p>The new Members Code of Conduct and procedures for determining complaints was adopted in June 2012, taking effect on 1 July 2012, under the Localism Act 2011.</p> <p>The Monitoring Officer has provided guidance and training on the Members Code of Conduct to Officers and Members, together with Parish Clerks and Parish Councillors. Refresher training is also regularly provided.</p>	.
6	Confidential Reporting Procedure	Yes	<p>The Whistleblowing Policy was first approved in November 2001 and is kept under regular review.</p> <p>Complaints received are investigated and the outcome reported to the Standards Committee. Employees are reminded about the procedure via staff communications, including in the Team Brief.</p>	

			The Committee first approved in September 2005 the Council's subscription to the Public Concern at Work Helpline to provide a formal method of confidential reporting for staff who do not feel able to raise issues directly with the Council. The Council has maintained this provision, but also makes available support via a contract with Care First, the Council's employee assistance programme.	
7	Terms Of Reference of the Standards Committee	Yes	The new Standards Committee was put in place in July 2012, under the terms of the Localism Act 2011, giving Councils the option of whether to retain a Standards Committee or nominate another Committee to oversee the determination of Code of Conduct complaints. The Borough Council's new Committee has retained much of its extended terms of reference, beyond the determination of complaints, in particular in relation to its monitoring of Anti-Fraud and Corruption Strategy and Whistleblowing Complaints.	
8	Scheme Of Delegation	Yes	This was updated by 1 April 2012 to take account of the revised management structures under Stronger Together which came into effect on that date. It has subsequently been approved again as part of the 2012/13 Constitution at the meeting of Annual Council meeting in May 2012.	
9	Members' Register Of Interests	Yes	Held on file and on the Council's website. Regular reminders are issued.  In accordance with the requirements of the Localism Act the Council also now publishes Register of Interest forms for all Parish Councillors in the Borough Area.	
10	Recorded Declaration Of Interests	Yes	Interests are recorded at meetings and are recorded on the website.	
11	Members' Induction Process	Yes	All new Councillors are provided with a comprehensive	

			<p>induction programme.</p> <p>All of the new Councillors attended the Induction training in May 2012 following the elections.</p>	
12	Officers' Induction Process	Yes	<p>Corporate induction process is in place and departmental induction processes are also in place.</p> <p>Reference is included in the Officers' Induction Process to the ethical framework. During staff induction it is checked that staff have received a copy of the code of conduct (which they usually have with their contracts) and they are reminded that it is their responsibility to read it and speak with their manager if they have any concerns. Staff are also advised of the disclosure of gifts etc information, and are also advised to contact their managers with any concerns regarding this, or any special arrangements made (for example, working in a care home at Christmas where people may buy them lots of gifts/goodies).</p> <p>It is the responsibility of managers to enforce the code of conduct and ethics and probity issues with staff.</p> <p>The Monitoring Officer liaises with the Head of People and Change on evaluating the implementation across departments of training on the ethical framework within the Officers' Induction Programme and on the monitoring of the officer induction process.</p>	
13 / 14	Members' Continuing Development and Training	Yes	<p>A range of development / training opportunities are offered and a record of attendance kept.</p> <p>Training for Councillors is facilitated by the Members Services Officer, in consultation with a cross-party Member Development Steering Group. This agrees the programme for training at the beginning of each year, and monitors the success of each course and the uptake from Councillors.</p>	

			<p><u>Mandatory Training.</u></p> <p>Licensing and the Planning Training was held in May 2012, after the Annual Council but prior to the first meetings of the year. Whilst the first session was primarily for new Councillors who would be serving on the Committees, all Members had the opportunity to attend, as the information provided could not only help Committee members but all Members of the Council in relation to their ward work. Such training was mandatory before a Councillor could serve on either the Planning or Licensing Committees. For the first time, training was also arranged for members who would be sitting on Education Transport Appeal Panels.</p> <p>All Councillors were invited to attend training on the new Member Code of Conduct , provided by the Monitoring Officer in July 2012.</p>	
15	Officers' Continuing Development	Yes	<p>"In Touch" is the Council's behaviour framework, which sets out the values and behaviours expected from officers and members. This currently forms part of the annual appraisal in place across the Council, and identifies development needs and provides structured options to accessing appropriate training. However, new arrangements will be issued shortly to meet the requirements of behaviour under Stronger Together.</p>	
16	Officers' Training	Yes	<p>A Learning &amp; Development online resource has been launched, which provides practical learning and development materials. There is also a <a href="#">Learning Zone</a> with links to coaching and networking e-learning modules developed by Good Practice. Other courses are available direct.</p>	

17	Other Council Specific Additional Codes And Protocols	<p><u>Monitoring Officer Protocol</u> - Adopted in December 2003 and last updated in May 2012 to reflect the changes in the management structure under Stronger Together.</p> <p><u>Guidance to Councillors on Dealing with the Media</u> – first adopted February 2002, and last reviewed and updated by the Committee in October 2010, following detailed consultation with members, to include in particular new provisions in relation to blogging and use of social media.</p> <p><u>Protocol on Member / Officer Relations</u> - Introduced September 2002 and regularly reviewed and updated. This was last updated in February 2010 to refer to the Council's Intouch programme. The Association of Secretaries and Solicitors (ACSeS) produced a model code, some of which is based on this Council's protocol.</p> <p><u>Members' Planning Code of Good Practice</u> - adopted February 2004, and regularly reviewed and updated. This was last amended in January 2012 to reflect the new rules in relation to Pre-Determination of Decisions under the Localism Act 2011.</p> <p><u>Anti-Fraud and Corruption Strategy</u> – adopted November 2001 and regularly reviewed and updated. This was last updated in October 2011, together with the Whistleblowing Policy, to take account of the Bribery Act 2010. A Fraud Response plan was developed by Internal Audit at the same time to assist managers in knowing how to deal with allegations of wrongdoing. The outcome of investigations are reported to the Standards Committee.</p> <p>A Swindon Internal Audit Services Bulletin is issued to Members and Officers approximately twice a year to promote fraud awareness by communicating information on frauds elsewhere to officers and Members, and enable similar frauds to be prevented.</p>	
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